

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**  
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ALLEN SOLOMON,

Plaintiff,

**Case Number 1:20-cv-05449-VEC**

-against-

CURT SZYMANSKI, and CAFFEINATION  
TITLE, LLC, *a Wisconsin limited liability  
company,*

**NOTICE OF MOTION**

Defendants.  
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**PLEASE TAKE NOTICE** that, based on the accompanying Memorandum of Law, Defendants, CURT SZYMANSKI and CAFFEINATION TITLE, LLC, by and through undersigned counsel, move this Court to dismiss Plaintiff's Complaint under Fed. R. Civ. P. 12(b)(2).

Respectfully Submitted,

**Law Offices of Nolan Klein, P.A.**

*Attorneys for Defendants*

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By: /s/ Nolan Klein  
NOLAN KLEIN, ESQ. (NK4223)  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing instrument was e-filed with the Clerk of Court using CM/ECF, this **31st** day of **August**, 2020.

By: /s/ Nolan Klein  
NOLAN KLEIN, ESQ.  
(NK4223)

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*Attorney for Plaintiff*